

**Before The
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554**

In the Matter of)	
)	
Amendments to Part 4 of the Commission's Rules)	PS Docket No. 15-80
Concerning Disruption to Communications)	
)	
New Part 4 of the Commission's Rules Concerning)	ET Docket No. 04-35
Disruptions to Communications)	
)	
The Proposed Extension of Part 4 of the)	PS Docket No. 11-82
Commission's Rules Regarding Outage Reporting)	
To Interconnected Voice over Internet Protocol)	
Providers and Broadband Internet Service)	
Providers)	

MOTION FOR EXTENSION OF TIME

Pursuant to Section 1.46 of the Commission's Rules, CTIA hereby seeks a 30-day extension of the deadline for filing reply comments in this proceeding, from September 12, 2016 until October 12, 2016.

While CTIA recognizes that extensions of time are not routinely granted, the brief extension sought is warranted for the following reasons. First, the initial comments filed on August 26, 2016 were voluminous and addressed a wide variety of technical and other issues raised by the Commission's proposed revisions to the outage reporting rules. Twenty-eight parties, including state public utilities commissions, trade associations, individual companies, public interest groups, E911 organizations, and individuals, filed comments comprising more than 350 pages in total. Providing stakeholders additional time beyond the current 15-day reply period will allow for review of these extensive initial comments, consideration of the varied

proposals therein, and the development of more robust replies and a more useful record. The Commission has previously granted extensions of time to file reply comments for this reason.¹

Second, the current 15-day reply period includes only ten business days and encompasses both the Labor Day holiday and CTIA Super Mobility 2016, its national convention, which is scheduled for September 7-9th. Many parties that filed initial comments, including many of their subject matter experts on network reliability and outage reporting, will attend this event. The brief extension will allow CTIA as well as those parties the needed additional time to review the initial comments with their subject matter experts and prepare reply comments. Again, the Commission has previously granted extensions of time to file reply comments for this reason.²

¹ See, e.g., Public Notice, Wireless Telecommunications Bureau Extends Reply Comments on Proposed Rules to Establish a Citizens Broadband Radio Service in the 3550-3650 MHz Band, DA 14-1071 (rel. July 28, 2014) (“*3550-3650 Extension PN*”) (extension “is warranted to enable interested parties sufficient opportunity to review and respond to the complex issues raised by the *FNPRM*.”); *Amendment of Parts 0, 1, 2 and 15 of the Commission’s Rules Regarding Authorization of Radiofrequency Equipment*, ET Docket No. 13-44, Order (rel. July 15, 2013) (extension “will provide parties an opportunity to fully analyze and respond to the many comments filed on a variety of points in response to the *Notice*”); Public Notice, Wireless Telecommunications Bureau Extends Period to File Reply Comments on Proposed Rules to Expand Access to Mobile Wireless Services Onboard Aircraft, DA 14-327 (rel. Mar. 10, 2014) (granting CTIA’s motion for 60-day extension of reply comment deadline and a second motion “to ensure that the Commission obtains a complete and thorough technical record”).

² See, e.g., *3550-3650 Extension PN* (granting Satellite Industry Association motion for extension; SIA had noted that many personnel responsible for analyzing the initial comments would be attending meetings to prepare for WRC-15).

For these reasons, CTIA asks that the Commission extend the reply comment deadline until October 12, 2016.

Respectfully submitted,

CTIA

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